

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

JAMES JOSPEH PAGLIEI, SR.

CHAPTER 7

Debtor

CASE #-20-12643-mdc

NOTICE OF DEBTOR'S APPLICATION TO EXTEND THE DEADLINES FOR
DEBTOR TO FILE SCHEDULES, STATEMENT OF FINANCIAL AFFAIRS
AND RELATED DOCUMENTS

Kindly take notice that Debtor, James Joseph Pagliei, Sr., through the undersigned counsel, has filed an Application to Extend the Deadline for Debtor to File Schedules Statement of Financial Affairs and Related Documents.

Any objection must be served on the undersigned counsel within seven (7) days of the date of service of this filing.

Respectfully submitted,

DATE: June 28, 2020

/S/ LEE M. HERMAN
Lee M. Herman, Esquire
280 N. Providence Road
Media, PA 19063
1-610-891-6500
Counsel to Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

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Debtor

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ORDER

AND NOW, this _____ day of _____, 2020, upon consideration of the Application of the Debtor for an Extension of time to file Documents, there being no objection and for Good Cause shown, it is hereby ORDERED:

Debtor's application is granted. Debtor shall file all missing documents on or before August 10, 2010.

BY THE COURT:

COLEMAN, U.S.B.J.

Lee M. Herman, Esquire
426-428 E. Baltimore Pike
Media, PA 19063
(610) 891-6500
Attorney for Debtor

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CASE #-20-12643-mdc

**DEBTOR'S APPLICATION FOR EXTENSION OF TIME
TO FILE DOCUMENTS**

Debtor through his proposed counsel respectfully apply to this Honorable Court for an Order allowing Debtor additional time to file missing documents and in support says:

1. This is a Chapter 7 matter filed on June 15, 2020.
2. This Honorable Court has jurisdiction over this application as it is a core proceeding regarding the administration of this matter under the Bankruptcy Code.
3. Debtor has not previously requested any extension of the time to file his Schedules, Statement of Financial Affairs and related documents. The deadline to file these documents is June 29, 2020.
4. Debtor has filed his Matrix and his Statement of Social Security Numbers.
5. Prior to the filing of this application, the undersigned has met with Debtor, reviewed documents provided by the debtor and prepared a draft of the required filings.

However, some additional information may be required to complete the necessary forms.

As such, Debtor has not yet reviewed, signed and returned any proposed filings.

6. It is anticipated that all filings will be made on or before the close of business on Tuesday, July 7, 2020, which is prior to the Section 341 Meeting of Creditors, scheduled for July 23, 2020.

7. In the abundance of caution, the undersigned respectfully requests that the deadline be further extended until July 10, 2010, and that the case not be dismissed accordingly.

8. Debtor believes that cause exists to permit and allow an extension of time to finish these documents.

WHEREFORE, Debtor respectfully requests this Honorable Court to enter an Order permitting an extension of time to file all remaining missing documents along with all other such relief as this Honorable Court deems just and proper.

Respectfully submitted,

DATE: June 28, 2020

/S/ LEE M. HERMAN
Lee M. Herman, Esquire
280 N. Providence Road
Media, PA 19063
1-610-891-6500
Counsel to Debtor

Lee M. Herman, Esquire
280 N. Providence Road
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CERTIFICATE OF SERVICE

LEE M. HERMAN, ESQUIRE certifies:

1. I am counsel to the Debtor.
2. I served a copy of the within Application to Extend Time to file Documents upon:

OFFICE OF THE U.S. TRUSTEE
Gary Seitz, Esquire, Chapter 7 Trustee

Via ECF

DATE: June 28, 2020

/s/ LEE M. HERMAN

LEE M. HERMAN